

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

ROY HARNESS, et al.,

Plaintiffs

v.

Civil Action No. 3:17cv791 DPJ-FKB

DELBERT HOSEMANN, Secretary of State  
of Mississippi,

Defendant

DECLARATION OF MATTHEW A. WILLIAMS

1. My name is Matthew A. Williams. This declaration, my resume, and my May 22, 2018 expert report in this case are being submitted as exhibits to the *Harness* Plaintiffs' Motion for Summary Judgment. The resume describes my professional experience and my formal education. The report contains the results of my research regarding certain statistics relating to felon disfranchisement in Mississippi.
2. As set forth in detail in my expert report of May 22, 2018, I have analyzed the dataset from the Mississippi Administrative Office of Courts (AOC) of criminal convictions from 1994 through 2017. My analysis estimates that 43,903 people were convicted of the disfranchising crimes, excluding murder and rape,

from 1994 through 2017. 59.2% of these people are black, 38.1% are white, and the remainder are other races or are unknown.

3. Census data from the Citizen Voting Age Population (CVAP) Special Tabulation From the 2011-2015 5-Year American Community Survey demonstrates that the voting age population in Mississippi is 36% black and 61% white and 3% other.

4. As is clear from these statistics, black adults are disproportionately represented among those convicted of disfranchising crimes relative to their share of the voting age population.

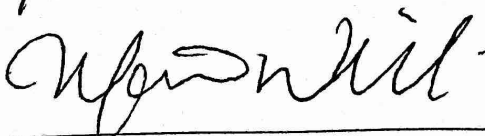
5. Comparing the numbers of people convicted of disfranchising crimes (excluding murder and rape) from 1994 to 2017 with the citizen voting age population as reflected in the 2011-2015 census estimates, black adults are 2.7 times more likely to have been convicted of a disfranchising crime than white adults. This figure is reached (a) first by dividing 25,990, which is the number of black people convicted of those disfranchising crimes during that period, by the estimated black voting age population of 795,780 to reach a figure of 3.2%, (b) then dividing 16,727, which is the number of white people convicted of those disfranchising crimes during that period, by the estimated white voting age population of 1,347,005 to reach of a figure of 1.2%, and then (c) dividing 3.2 by

1.2 to estimate that black adults are 2.7 times more likely to have been convicted of one of those disfranchising crimes than white people.

6. Comparing the numbers of people convicted of disfranchising crimes (excluding murder and rape) from 2011-2015 (rather than the full AOC database period of 1994-2017) with the citizen voting age population as reflected in the 2011-2015 census estimates, black adults are 2.4 times more likely to be convicted of a disfranchising crime than white adults. This figure is reached (a) first by dividing 4,858, which is the number of black people convicted of those disfranchising crimes during that period, by the estimated black voting age population of 795,780 to reach of a figure of 0.61%, (b) then dividing 3,364, which is the number of white people convicted of those disfranchising crimes during that period, by the estimated white voting age population of 1,347,005 to reach a figure of 0.25%, and then (c) dividing 0.61 by 0.25 to estimate that black adults are 2.4 times more likely to have been convicted of one of those disfranchising crimes during that time period than white people.

Pursuant to 28 USC 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and understanding. Executed on the

4<sup>th</sup> day of October, 2018.



Matthew A. Williams